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FOR SETTLEMENT PURPOSES; NOT ADMISSIBLE

SENT VIA FEDERAL EXPRESS

Timothy L. Feagans
Senior Vice President and General Counsel
Saint-Gobain Corporation
750 East Swedesford Road, P.O. Box 860
Valley Forge, PA 19482

Lauren Alterman
Vice President Environmental Health
and Safety
Saint-Gobain Corporation
750 East Swedesford Road, P.O. Box 860
Valley Forge, PA 19482

Re: RCRA Citizens' Suit - Hoosick Falls, New York

Dear Mr. Feagans and Ms. Alterman:

Our law firm represents Healthy Hoosick Water ("HHW"). HHW was recently created by a group of residents of The Village of Hoosick Falls, New York. As you are aware, Saint-Gobain Performance Plastics Corporation ("SGPP") owns and operates facilities in Hoosick Falls. The SGPP facility at 14 McCaffrey Street in Hoosick Falls is adjacent to the Village's well field and water treatment plant. It is the source of PFOA contamination present in the Village's wells and water system.

The purpose of this letter is to advise you that we are prepared to provide formal notice to SGPP and Saint-Gobain Corporation of HHW's intent to sue under RCRA §7002(a)(1)(B) (42 USC §6972(a)(1)(B)). The basis for HHW's suit is as follows: (1) the Hoosick Falls water system is contaminated and remedial action is required; (2) SGPP's practices have resulted in the spread of PFOA contamination throughout Hoosick Falls; (3) the cost of responding to the contamination

should not fall on the residents of Hoosick Falls; and (4) SGPP and Saint-Gobain Corporation are the appropriate parties who should bear the costs associated with addressing the PFOA contamination in Hoosick Falls. We are enclosing a copy of the "Notice" letter that we are prepared to formally serve upon SGPP and Saint-Gobain Corporation as well as the United States Environmental Protection Agency and the New York State Department of Environmental Conservation.

Extensive litigation has occurred elsewhere in the United States with respect to PFOA contamination. The problems associated with PFOA contamination of public water supplies are well-documented. The human health risks and effects due to PFOA exposure are well-documented. The scientific and medical studies demonstrate that PFOA exposure causes various forms of cancer and other maladies. The people of Hoosick Falls have experienced a range of health effects associated with PFOA exposure.

We are aware that this is a sensitive matter. Accordingly, we are informing you ahead of time of our intention to pursue a suit before we initiate the formal notice process. Our purpose is to engage Saint-Gobain Corporation in substantive discussions for the purpose of bringing this matter to an expedited and legally binding conclusion.

We are aware that Saint-Gobain Corporation has engaged in discussions with Hoosick Mayor Borge. To date, those discussions have produced nothing in the way of a positive result for the Village and its residents. Moreover, the public statements by the Mayor regarding the risks and dangers associated with PFOA exposure have been inaccurate and inconsistent with current scientific and medical understanding. We are confident that Saint-Gobain Corporation is familiar with the most recent studies with respect to PFOA exposure. On behalf of all Hoosick Falls residents, HHW is not willing to stand by while this critical problem remains unaddressed.

HHW is chaired by Dr. Marcus Martinez. Dr. Martinez is a highly respected General

Practitioner in Hoosick Falls. He is intimately familiar with the health problems in the Hoosick community. HHW has also retained qualified experts in the fields of environmental toxicology and the fate and transport of contaminants in the environment. Our law firm has been working on this matter for several months. We have been engaged in extensive fact-finding with respect to SGPP's practices in Hoosick Falls. Our fact-finding and case development include discussions with former SGPP employees who have provided accounts and information regarding SGPP's practices with respect to PFOA and related substances. Accordingly, in the event that this matter cannot be resolved on an expedited basis without litigation, we are prepared to pursue our case on the basis of an expedited schedule for discovery.

Please let us know by no later than the close of business October 26th whether Saint-Gobain Corporation is available for immediate substantive discussions for the purpose of resolving this matter.

Very truly yours,

NOLAN & HELLER, LLP

A handwritten signature in black ink, appearing to read "D. Engel", written over the printed name.

David A. Engel

DAE/lcd
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